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April 4, 2005

VIA COURIER DELIVERY

Larry Bradfish
Office of Regional Counsel
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street (ORC-3)
San Francisco, California 94105

Re: Oahu Sugar Company, LLC
Unilateral Administrative Order
USEPA Docket No. 9-2005-08

Dear Mr. Bradfish:

Per your request for additional information concerning the financial status of my client, Oahu Sugar Company, enclosed please find the following documents:

1. Second Amended Disclosure Statement with Respect to Joint Plan of Reorganization of Amfac Hawaii, LLC, Certain of its Subsidiaries and FHT Corporation Under Chapter 11 of the Bankruptcy Code.

This Disclosure Statement was filed for ten debtor entities: Amfac Hawaii, LLC ("AHI"), Amfac Holdings Corp., Amfac Land Company, Limited, FHT Corporation, Kaanapali Development Corp., Kaanapali Estate Coffee, Inc., KDCW, Inc., Pioneer Mill Company, Limited, The Lihue Plantation Company, Limited and Waialeale Golf Club, Inc. Directing your attention to page 32 of the Disclosure Statement, the status of Oahu Sugar is discussed:

Certain subsidiaries of AHI are not Debtors in these Chapter 11 Cases. These entities include APDC, Amfac Property Investment Corp., H. Hackfield & Co., Ltd., Kekaha Sugar Company, Limited ("KSCo"), Oahu Sugar Company, Ltd., ("Oahu Sugar") and Puna Sugar Company, Limited. Many of these entities were involved in agricultural, land development or investment businesses, that have ceased operation. These companies either have no value or assets that are encumbered by

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debt which exceeds or approximates the value of their assets; therefore, they are not expected to add any significant value to Kaanapali Land after giving effect to the Mergers and the Plan. For more information on the Non-Debtor AHI Subsidiaries, see the Form 10-K attached as Exhibit B.

At the time of the bankruptcy, Oahu Sugar was a fourth-tier subsidiary of AHI, with each intermediate tier occupied by an entity that was a debtor in the bankruptcy. The bankruptcy discharged all of the debts of those entities. As noted, Exhibit B is the Form 10-K, filed with the SEC for Amfac Hawaii, LLC. The 10-K makes several disclosures concerning Oahu Sugar. First, at page 71, the following disclosure is made:

Oahu Sugar is substantially without assets to satisfy any judgment in the action. However, the liability, if any, of Oahu Sugar in this asbestos matter should not extend to AHI and its other subsidiaries.

On the next page of the Form 10-K, page 72, this matter is disclosed:

As a result of an administrative order issued to Oahu Sugar Company by the Hawaii Department of Health, Order No. CH 98-0012, dated January 27, 1998, Oahu Sugar is currently engaged in environmental site assessment of lands it leased from the U.S. Navy and located on the Waipio Peninsula. Sampling is underway and the investigation is otherwise still in its preliminary states.

Returning to the Disclosure Statement, at page 60, the reservation of claims against the non-debtor subsidiaries, including Oahu Sugar, is discussed. The referenced claims against Oahu Sugar, including the Northbrook Senior Claims, the Indenture Trustee Claims and the COLA Holder Claims, were assigned to Kaanapali Land, LLC pursuant to the terms of the bankruptcy plan that was approved by the bankruptcy court and totalled at least \$160,000,000. As with any claims concerning Waipio, Oahu Sugar is substantially without assets to satisfy the claims of Kaanapali Land, LLC if a bankruptcy filing should occur as are the other remaining Non-Debtor AHI Subsidiaries noted above.

2. Order Confirming Second Amended Joint Plan of Reorganization dated June 11, 2002.

This is the order signed by the Bankruptcy Court, the Honorable Bruce W. Black, approving the Second Amended Joint Plan of Reorganization.

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3. Motion of Debtors for an Order Authorizing Nonmaterial Modifications to Second Amended Joint Plan of Reorganization of Amfac Hawaii, LLC, Certain of its Subsidiaries and FHT Corporation Under Chapter 11 of the Bankruptcy Code and Approving Certain Procedures in Connection with the Tabulation of Elections Pursuant to the Plan.

In the interest of completeness I also enclose the nonmaterial modifications which were made to the approved Joint Plan of Reorganization. These modifications are not relevant for your purposes.

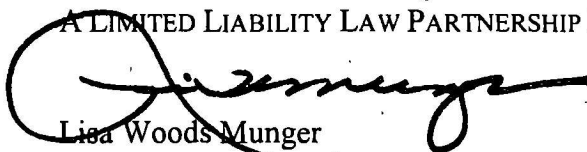
4. Order Authorizing Nonmaterial Modifications to Second Amended Joint Plan of Reorganization of Amfac Hawaii, LLC, Certain of the Subsidiaries and FHT Corporation Under Chapter 11 of the Bankruptcy Code and Approving Certain Procedures in Connection with the Tabulation of Elections Pursuant to the Plan.

This is the order issued by the Bankruptcy Court concerning the nonmaterial modifications to the Plan. Again, this is not relevant for your purposes and is enclosed merely to give you a complete copy of the plan as finally approved by the bankruptcy court.

As you can see from these disclosure statements, as a result of the Chapter 11 Reorganization of Amfac Hawaii, LLC and its subsidiaries, Oahu Sugar remains encumbered by debt which substantially exceeds the value of its assets. That debt also dwarfs the cost of addressing the remaining issues at the Waipio Site.

Very truly yours,

GOODSILL ANDERSON QUINN & STIFEL
A LIMITED LIABILITY LAW PARTNERSHIP LLP



Lisa Woods Munger
Lisa A. Bail

LWM/LAB:crlld
Enclosures